UNITED STATES DISTRICT COURT EASTERN DISTRICT OF WISCONSIN AT LAW AND IN ADMIRALTY

UNITED STATES OF AMERICA,

Plaintiff,

v. Case No.

APPROXIMATELY \$16,400.00 IN UNITED STATES CURRENCY FROM SUNRISE BANKS,

APPROXIMATELY \$400.00 IN UNITED STATES CURRENCY FROM AMERICAN EXPRESS, and

APPROXIMATELY \$200.00 IN UNITED STATES CURRENCY FROM U.S. BANK,

Defendants.

VERIFIED COMPLAINT FOR CIVIL FORFEITURE IN REM

The United States of America, by its attorneys, Gregory J. Haanstad, United States

Attorney for the Eastern District of Wisconsin, and Scott J. Campbell, Assistant United States

Attorney for this district, alleges the following in accordance with Supplemental Rule G(2) of the Federal Rules of Civil Procedure:

Nature of the Action

1. This is a civil action to forfeit property to the United States of America for violations of 18 U.S.C. §§ 1028, 1029, and 1956(h).

The Defendants In Rem

2. On or about April 22, 2017, Milwaukee County Sheriff's Deputies seized as evidence 178 prepaid access devices, identified in attached Exhibit A, from Spencer Dixon,

Astagshia Lobasco, Shawn Porterfield, James Reed, and Eric Spann at or near General Mitchell International Airport, 5300 South Howell Avenue, Milwaukee, Wisconsin.

- 3. On or about November 21, 2017, pursuant to seizure warrant #17-M-1376 issued by United States Magistrate Judge William E. Duffin in the Eastern District of Wisconsin, the United States Secret Service seized the 178 prepaid access devices, including all funds available on those cards, from the Milwaukee County Sheriff's Department.
- 4. On or about November 28, 2017, the United States Secret Service served seizure warrant #17-M-1376 on the three financial institutions that issued the 178 prepaid access devices namely, Sunrise Banks, American Express, and U.S. Bank.
- 5. On or about December 11, 2017, and January 18, 2018, the United States Secret Service received checks from Sunrise Banks, American Express, and U.S. Bank for all funds available on their respectively issued prepaid access devices.
- 6. Those funds from Sunrise Banks, American Express, and U.S. Bank are the defendant properties in this case and are more fully described as follows:
 - A. Approximately \$16,400.00 in United States currency from Sunrise Banks, which constitutes all funds stored on 172 access device cards identified under numbers 7 through 178 on attached Exhibit A, and which funds were seized on or about January 18, 2018,
 - B. Approximately \$400.00 in United States currency from American Express, which constitutes all funds stored on access four device cards identified under numbers 3 through 6 on attached Exhibit A, and which funds were seized on or about January 18, 2018, and
 - C. Approximately \$200.00 in United States currency from U.S. Bank, which constitutes all funds stored on two access device cards identified under numbers 1 and 2 on attached Exhibit A, and which funds were seized on or about December 11, 2017,

(hereinafter collectively referred to as the "Defendant Properties").

7. The Defendant Properties are presently in the custody of the United States Secret Service in Milwaukee, Wisconsin.

Jurisdiction and Venue

- 8. This Court has subject matter jurisdiction over an action commenced by the United States under 28 U.S.C. § 1345, and over an action for forfeiture under 28 U.S.C. § 1355(a).
- 9. This Court has *in rem* jurisdiction over the Defendant Properties under 28 U.S.C. § 1355(b).
- 10. Venue is proper in this district under 28 U.S.C. § 1355(b)(1), because acts or omissions giving rise to the forfeiture occurred in this district.

Basis for Forfeiture

- 11. The Defendant Properties are subject to forfeiture to the United States of America under 18 U.S.C. § 981(a)(1)(C), including cross-references to 18 U.S.C. §§ 1956(c)(7) and 1961(1) because they are funds that were stored on the 178 prepaid access devices, and those 178 prepaid access devices were purchased with proceeds traceable to both identity fraud and credit card and access device fraud offenses, committed in violation of 18 U.S.C. §§ 1028 and 1029, respectively.
- 12. In addition, the Defendant Properties are subject to forfeiture to the United States of America under 18 U.S.C. § 981(a)(1)(A) because the Defendant Properties, and the 178 prepaid access devices on which the Defendant Properties were stored, were "involved in" a money laundering conspiracy. Specifically, the co-conspirators sought to launder the proceeds of their identify fraud and access device fraud offenses by using the 178 prepaid access devices, which they had bought with cloned credit cards, to buy money orders and to then use the money orders as cash, all for the purpose of concealing the nature, source, location, ownership, and control of the proceeds of the underlying offenses, in violation of the money laundering conspiracy statute, 18 U.S.C. § 1956(h).

Facts

- 13. Criminals engaging in identify fraud and credit card and access device fraud often create and use cloned credit cards, which contain the account numbers of identity fraud victims, to purchase prepaid access devices, which can then be sold or redeemed, as an unlawful way to obtain cash value from a victim's credit card account.
- 14. When committing identity fraud and credit card and access device fraud crimes, criminals may travel to different geographical locations for the purpose of using cloned credit cards to purchase prepaid access devices. By traveling, the criminals who unlawfully use cloned credit cards reduce the chance that they will be caught by law enforcement. That is because, frequently, by the time law enforcement officers learn that cloned credit cards have been used in the area, the credit card cloners have already departed and have often left few investigative leads to follow up on.
- 15. Criminals who travel to commit credit card and access device fraud frequently travel with a laptop computer and a card reader-writer, along with other equipment, so that they can both (a) purchase credit and debit account information for the purpose of manufacturing cloned credit cards, and (b) manufacture cloned credit cards while they are traveling.

April 21, 2017 use of a cloned credit card to purchase airline tickets

- 16. On April 21, 2017, at approximately 6:30 p.m., Astagshia Lobasco and Shawn Porterfield arrived at the American Airlines ticket counter at General Mitchell International Airport located at 5300 S. Howell Avenue, Milwaukee, Wisconsin.
- 17. There, Lobasco and Porterfield purchased five American Airlines tickets for a flight from Milwaukee, Wisconsin, to Atlanta, Georgia, that was scheduled to depart from Milwaukee on April 22, 2017, at 6:53 a.m.

- 18. Astagshia Lobasco and Shawn Porterfield paid for the five American Airlines tickets that they purchased on April 21, 2017, through two transactions on the credit card they provided to American Airlines. The first transaction was for two tickets in the names of Astagshia Lobasco and Eric Spann. The second transaction was for three tickets in the names of Shawn Porterfield, Spencer Dixon, and James Reed.
- 19. Astagshia Lobasco and Shawn Porterfield paid for the five American Airlines tickets that they purchased on April 21, 2017, using a cloned credit card.
- 20. The legitimate owner of the credit card account number that Astagshia Lobasco and Shawn Porterfield used to purchase the five American Airline tickets had not given Astagshia Lobasco or Shawn Porterfield consent to use the victim's credit card account number.

April 22, 2017 arrest of Spencer Dixon, Astagshia Lobasco, Shawn Porterfield, James Reed, and Eric Spann, and seizure of evidence, including 178 prepaid access devices

- 21. On April 22, 2017, at approximately 6:30 a.m., Milwaukee County Sheriff's Deputies located and detained Spencer Dixon, Astagshia Lobasco, Shawn Porterfield, James Reed, and Eric Spann outside gate D54 at General Mitchell International Airport. The deputies also secured all property these individuals had in their possession.
- 22. Astagshia Lobasco admitted that she had purchased the five airline tickets using a cloned credit card. Lobasco also admitted that she had received that cloned credit card from Eric Spann.
- 23. Astagshia Lobasco further admitted that she and the other four detainees had traveled to Milwaukee, Wisconsin, from Atlanta, Georgia, for the purpose of using cloned credit cards to purchase prepaid gift cards, which are also known as prepaid access devices.
- 24. Astagshia Lobasco further admitted that she and the other four detainees intended to use those prepaid gift cards to purchase money orders and to then use the money orders as cash.

- 25. On April 22, 2017, a Milwaukee County Sheriff's detective obtained a state search warrant for all wallets, small bags, and travel bags that were claimed by Spencer Dixon, Astagshia Lobasco, Shawn Porterfield, James Reed, and Eric Spann.
- 26. Pursuant to that search warrant, Spencer Dixon, Astagshia Lobasco, Shawn Porterfield, James Reed, and Eric Spann were found to be in possession of cloned credit cards and prepaid access devices. Detectives seized from these five suspects approximately 54 suspected cloned credit cards and more than 178 prepaid access devices, also known as gift cards.
- 27. At least 48 of the approximately 54 suspected cloned credit cards were in fact cloned credit cards.
- 28. At least 43 of those 48 cloned credit cards bore one of the following names: Spencer Dixon, Astagshia Lobasco, Shawn Porterfield, James Reed, or Eric Spann.
- 29. Spencer Dixon, Astagshia Lobasco, Shawn Porterfield, James Reed, and Eric Spann used those cloned credit cards to obtain the 178 prepaid access devices.
- 30. At least 14 victims whose credit card account numbers were found to be encoded on some of the 48 cloned credit cards had fraudulent activity on their accounts. These 14 victims had not given Spencer Dixon, Astagshia Lobasco, Shawn Porterfield, James Reed, or Eric Spann consent to use the victims' account numbers.
- 31. Eric Spann also had in his possession an Apple iMac laptop computer and an MSR X6 Deftun magnetic strip reader-writer.

Forensic examination of Eric Spann's iMac laptop computer

32. Pursuant to a state search warrant, a forensic examination was completed on the Apple iMac laptop computer that was found Eric Spann's possession.

- 33. On April 20, 2017, Eric Spann's iMac computer had been used to make multiple visits to the website "briansclub.at." In addition, the iMac computer had been used to access the "orders" and "billing" pages at "briansclub.at."
- 34. "Briansclub.at" is an Automated Carding Shop (ACS) where people can purchase credit/debit account information for the purpose of manufacturing cloned cards utilizing victim credit/debit account numbers.
- 35. The sole purpose of the credit card account numbers for sale and the subsequent purchase of them is for illicit purposes.
- 36. "Briansclub.at" is one of many websites where fraudsters can purchase peoples' account numbers or other personal identifying information (PII) for the purpose of manufacturing cloned credit cards or opening up lines of credit using a victim's PII.
- 37. Someone exercising control of the iMac computer made purchases of victims' credit/debit account numbers from "briansclub.at."

Scanning of the prepaid access device cards seized as evidence on April 22, 2017

- 38. On or about August 30, 2017, investigators used an Electronic Recovery and Access to Data device to scan the magnetic strips of the more than 178 prepaid access devices seized from Spencer Dixon, Astagshia Lobasco, Shawn Porterfield, James Reed, and Eric Spann on April 22, 2017.
- 39. A total of 178 of those prepaid access devices had value stored on them, as detailed on attached Exhibit A. Of those 178 prepaid access devices,
 - A. 172 were issued by Sunrise Banks. Of those 172 prepaid access devices, 156 had a stored value of \$100 each and 16 had a stored value of \$50 each, for a total of \$16,400;
 - B. Four were issued by American Express and had a stored value of \$100 each, for a total of \$400; and

- C. Two were issued by U.S. Bank and had a stored value of \$100 each, for a total of \$200.
- 40. Spencer Dixon, Astagshia Lobasco, Shawn Porterfield, James Reed, and Eric Spann traveled from Atlanta to Milwaukee and purchased the 178 prepaid access devices using the above-described cloned credit cards and PII associated with those credit card owners, in violation of both the identity fraud statute, 18 U.S.C. § 1028, as well as the access device fraud statute, 18 U.S.C. § 1029.
- 41. Accordingly, the 178 prepaid access devices contained proceeds of the identity fraud and access device fraud offenses that co-conspirators Spencer Dixon, Astagshia Lobasco, Shawn Porterfield, James Reed, and Eric Spann committed when they cloned victims' credit cards and used those cloned cards to buy the 178 prepaid access devices.
- 42. Co-conspirators Spencer Dixon, Astagshia Lobasco, Shawn Porterfield, James Reed, and Eric Spann intended to use the 178 prepaid access devices to purchase money orders and to then use the money orders as cash, as a means of laundering the proceeds of their identify fraud and access device fraud offenses.
- 43. The 178 prepaid access devices, together with the Defendant Property funds stored on those access devices, were "involved in" a conspiracy to launder the proceeds of the identity fraud and access device and credit card fraud offenses, in violation of the money laundering conspiracy statute, 18 U.S.C. § 1956(h).

State Charges

44. On April 26, 2017, Spencer Dixon, Astagshia Lobasco, Shawn Porterfield, James Reed, and Eric Spann were each charged in Milwaukee County Circuit Court with Credit Card – Fraudulent Use, contrary to Wis. Stat. § 943.41(5)(a), and Conspiracy to Commit, contrary to Wis. Stat. § 939.31, in case numbers 17CF1986, 17CF1987, 17CF1988, 17CF1989, and 17CF1990, respectively.

45. In each of their respective Milwaukee County criminal cases, Spencer Dixon, Astagshia Lobasco, Shawn Porterfield, James Reed, and Eric Spann provided their home addresses as either Atlanta, Georgia; Marietta, Georgia; or Kennesaw, Georgia.

Warrant for Arrest In Rem

46. Upon the filing of this complaint, the plaintiff requests that the Court issue an arrest warrant *in rem* pursuant to Supplemental Rule G(3)(b), which the plaintiff will execute upon the Defendant Properties pursuant to 28 U.S.C. § 1355(d) and Supplemental Rule G(3)(c).

Claims for Relief

- 47. The plaintiff alleges and incorporates by reference the paragraphs above.
- 48. By the foregoing and other acts, the Defendant Properties are funds that were stored on the 178 prepaid access devices, and those Defendant Property funds constitute, or are traceable to, proceeds of both identity fraud and credit card and access device fraud offenses, committed in violation of 18 U.S.C. §§ 1028 and 1029, respectively, and were also "involved in" a money laundering conspiracy, committed in violation of 18 U.S.C. § 1956(h).
- 49. The Defendant Properties are therefore subject to forfeiture to the United States of America under 18 U.S.C. §§ 981(a)(1)(A) and (C), including cross-references to 18 U.S.C. §§ 1956(c)(7) and 1961(1).

WHEREFORE, the United States of America prays that a warrant of arrest for the Defendant Properties be issued; that due notice be given to all interested parties to appear and show cause why the forfeiture should not be decreed; that judgment declare the Defendant Properties to be condemned and forfeited to the United States of America for disposition according to law; and that the United States of America be granted such other and further relief as this Court may deem just and equitable, together with the costs and disbursements of this action.

Dated at Milwaukee, Wisconsin, this 19th day of January, 2018.

Respectfully submitted,

GREGORY J. HAANSTAD United States Attorney

By:

s/SCOTT J. CAMPBELL

SCOTT J. CAMPBELL
Assistant United States Attorney

Scott J. Campbell Bar Number: 1017721

Attorney for Plaintiff

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Verification

I, John Milotzky, hereby verify and declare under penalty of perjury that I am a Detective

with the Wauwatosa Police Department ("WPD") and a Task Force Agent assigned to the United

States Secret Service Milwaukee Resident Office Financial Crimes Task Force ("MFCTF"), that

I have read the foregoing Verified Complaint for Civil Forfeiture *in rem* and know the contents

thereof, and that the factual matters contained in paragraphs 11 through 43 of the Verified

Complaint are true to my own knowledge.

The sources of my knowledge and information are the official files and records of the

United States, information supplied to me by other law enforcement officers, as well as my

investigation of this case, together with others, as a Detective with the WPD and a Task Force

Agent with the MFCTF.

I hereby verify and declare under penalty of perjury that the foregoing is true and correct.

Date: 1/18/18 s/JOHN MILOTZKY

John Milotzky

No.	Inventory #	<u>Issuer</u>	Card #	Brand	Balance
1.	17-985-1	U.S. Bank Nat'l Assoc'n	542837xxxxxx6966	Mastercard	\$100
2.	17-985-1	U.S. Bank Nat'l Assoc'n	542837xxxxxx5315	Mastercard	\$100
3.	17-985-1	American Express	379039xxxxx4568	American Express	\$100
4.	17-985-1	American Express	379039xxxxx1231	American Express	\$100
5.	17-985-1	American Express	379039xxxxx8299	American Express	\$100
6.	17-985-1	American Express	379039xxxxx4391	American Express	\$100
7.	17-985-1	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx5392	Visa	\$50
8.	17-985-1	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx9444	Visa	\$50
9.	17-985-1	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx8178	Visa	\$50
10.	17-985-1	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx7937	Visa	\$50
11.	17-985-1	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx1022	Visa	\$50
12.	17-985-1	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx9670	Visa	\$50
13.	17-985-1	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx4469	Visa	\$50
14.	17-985-1	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx8271	Visa	\$50
15.	17-985-1	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx3759	Visa	\$100
16.	17-985-1	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx1552	Visa	\$100
17.	17-985-1	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx5028	Visa	\$100
18.	17-985-1	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx7287	Visa	\$100
19.	17-985-1	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx8930	Visa	\$100
20.	17-985-1	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx6199	Visa	\$100
21.	17-985-1	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx6037	Visa	\$100
22.	17-985-1	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx4680	Visa	\$100
23.	17-985-1	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx6678	Visa	\$100
24.	17-985-1	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx4339	Visa	\$100
25.	17-985-1	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx8718	Visa	\$100
26.	17-985-1	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx9179	Visa	\$100
27.	17-985-1	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx2700	Visa	\$100
28.	17-985-1	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx1992	Visa	\$100
29.	17-985-1	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx8856	Visa	\$100
30.	17-985-1	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx5123	Visa	\$100
31.	17-985-1	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx8585	Visa	\$100
32.	17-985-1	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx2910	Visa	\$100
33.	17-985-9	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx9081	Visa	\$100
34.	17-985-9	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx2099	Visa	\$100
35.	17-985-9	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx1487	Visa	\$100
36.	17-985-9	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx5080	Visa	\$100
37.	17-985-9	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx3689	Visa	\$100
38.	17-985-9	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx1200	Visa	\$100
39.	17-985-9	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx2450	Visa	\$100
40.	17-985-9	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx1450	Visa	\$100
41.	17-985-9	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx1957	Visa	\$100
42.	17-985-9	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx9437	Visa	\$100

No.	Inventory #	<u>Issuer</u>	Card #	Brand	Balance
43.	17-985-9	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx2672	Visa	\$100
44.	17-985-9	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx7428	Visa	\$100
45.	17-985-9	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx5253	Visa	\$100
46.	17-985-9	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx6018	Visa	\$100
47.	17-985-9	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx4604	Visa	\$100
48.	17-985-9	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx8121	Visa	\$100
49.	17-985-9	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx4567	Visa	\$100
50.	17-985-9	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx7716	Visa	\$100
51.	17-985-9	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx6440	Visa	\$100
52.	17-985-9	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx4542	Visa	\$100
53.	17-985-9	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx1807	Visa	\$100
54.	17-985-9	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx8316	Visa	\$100
55.	17-985-9	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx4234	Visa	\$100
56.	17-985-9	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx2714	Visa	\$100
57.	17-985-9	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx1548	Visa	\$100
58.	17-985-9	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx9235	Visa	\$100
59.	17-985-9	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx4007	Visa	\$100
60.	17-985-9	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx8423	Visa	\$100
61.	17-985-9	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx9199	Visa	\$100
62.	17-985-9	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx9429	Visa	\$100
63.	17-985-30	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx2058	Visa	\$100
64.	17-985-30	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx6605	Visa	\$100
65.	17-985-30	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx9086	Visa	\$100
66.	17-985-30	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx7479	Visa	\$100
67.	17-985-30	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx1266	Visa	\$100
68.	17-985-31	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx7371	Visa	\$100
69.	17-985-31	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx1791	Visa	\$100
70.	17-985-31	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx0433	Visa	\$100
71.	17-985-31	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx6909	Visa	\$100
72.	17-985-31	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx4056	Visa	\$100
73.	17-985-31	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx3989	Visa	\$100
74.	17-985-32	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx2941	Visa	\$100
75.	17-985-32	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx5911	Visa	\$100
76.	17-985-32	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx1855	Visa	\$100
77.	17-985-32	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx3556	Visa	\$100
78.	17-985-32	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx3637	Visa	\$100
79.	17-985-32	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx9070	Visa	\$100
80.	17-985-32	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx4070	Visa	\$100
81.	17-985-32	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx1778	Visa	\$100
82.	17-985-32	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx2135	Visa	\$100
83.	17-985-33	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx6180	Visa	\$100
84.	17-985-33	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx6253	Visa	\$100
85.	17-985-33	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx6442	Visa	\$100

No.	Inventory #	<u>Issuer</u>	<u> Card #</u>	Brand	Balance
86.	17-985-33	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx2737	Visa	\$100
87.	17-985-33	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx4945	Visa	\$100
88.	17-985-38	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx6342	Visa	\$100
89.	17-985-38	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx1390	Visa	\$100
90.	17-985-38	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx2132	Visa	\$100
91.	17-985-38	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx5526	Visa	\$100
92.	17-985-38	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx3634	Visa	\$100
93.	17-985-38	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx5053	Visa	\$100
94.	17-985-38	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx1682	Visa	\$100
95.	17-985-38	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx6618	Visa	\$100
96.	17-985-38	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx9396	Visa	\$100
97.	17-985-38	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx2018	Visa	\$100
98.	17-985-38	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx5754	Visa	\$100
99.	17-985-42	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx0308	Visa	\$100
100.	17-985-42	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx6825	Visa	\$100
101.	17-985-42	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx1166	Visa	\$100
102.	17-985-42	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx1768	Visa	\$100
103.	17-985-42	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx5686	Visa	\$100
104.	17-985-42	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx0646	Visa	\$100
105.	17-985-42	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx8450	Visa	\$100
106.	17-985-42	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx2389	Visa	\$100
107.	17-985-42	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx5348	Visa	\$100
108.	17-985-42	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx0337	Visa	\$100
109.	17-985-42	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx9938	Visa	\$100
110.	17-985-42	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx0563	Visa	\$100
111.	17-985-42	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx1743	Visa	\$100
112.	17-985-42	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx4016	Visa	\$100
113.	17-985-42	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx6358	Visa	\$100
114.	17-985-42	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx9406	Visa	\$100
115.	17-985-42	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx3700	Visa	\$100
116.	17-985-42	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx2213	Visa	\$100
117.	17-985-42	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx9768	Visa	\$100
118.	17-985-44	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx5566	Visa	\$50
119.	17-985-44	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx1210	Visa	\$50
120.	17-985-44	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx7827	Visa	\$50
121.	17-985-44	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx0228	Visa	\$50
122.	17-985-44	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx0770	Visa	\$50
123.	17-985-44	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx1332	Visa	\$50
124.	17-985-44	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx0045	Visa	\$50
125.	17-985-44	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx8395	Visa	\$50
126.	17-985-44	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx2785	Visa	\$100
127.	17-985-44	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx1006	Visa	\$100
128.	17-985-44	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx6118	Visa	\$100

No.	Inventory #	<u>Issuer</u>	<u> Card #</u>	Brand	Balance
129.	17-985-44	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx8900	Visa	\$100
130.	17-985-44	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx1794	Visa	\$100
131.	17-985-44	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx3299	Visa	\$100
132.	17-985-44	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx6583	Visa	\$100
133.	17-985-44	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx7236	Visa	\$100
134.	17-985-44	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx9357	Visa	\$100
135.	17-985-44	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx5352	Visa	\$100
136.	17-985-44	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx8103	Visa	\$100
137.	17-985-44	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx4923	Visa	\$100
138.	17-985-44	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx0859	Visa	\$100
139.	17-985-44	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx5330	Visa	\$100
140.	17-985-44	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx2330	Visa	\$100
141.	17-985-44	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx9648	Visa	\$100
142.	17-985-44	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx2857	Visa	\$100
143.	17-985-44	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx1928	Visa	\$100
144.	17-985-44	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx3306	Visa	\$100
145.	17-985-44	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx0595	Visa	\$100
146.	17-985-44	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx1425	Visa	\$100
147.	17-985-44	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx1371	Visa	\$100
148.	17-985-44	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx0217	Visa	\$100
149.	17-985-44	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx2133	Visa	\$100
150.	17-985-44	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx0993	Visa	\$100
151.	17-985-44	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx3381	Visa	\$100
152.	17-985-44	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx4414	Visa	\$100
153.	17-985-44	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx8350	Visa	\$100
154.	17-985-44	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx5946	Visa	\$100
155.	17-985-44	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx5525	Visa	\$100
156.	17-985-44	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx5036	Visa	\$100
157.	17-985-44	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx2014	Visa	\$100
158.	17-985-44	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx0687	Visa	\$100
159.	17-985-44	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx9476	Visa	\$100
160.	17-985-44	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx2168	Visa	\$100
161.	17-985-44	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx5387	Visa	\$100
162.	17-985-44	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx3888	Visa	\$100
163.	17-985-44	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx9776	Visa	\$100
164.	17-985-44	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx4951	Visa	\$100
165.	17-985-44	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx0676	Visa	\$100
166.	17-985-44	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx2941	Visa	\$100
167.	17-985-44	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx9271	Visa	\$100
168.	17-985-44	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx2419	Visa	\$100
169.	17-985-44	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx1939	Visa	\$100
170.	17-985-44	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx0332	Visa	\$100
171.	17-985-44	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx1490	Visa	\$100

No.	Inventory #	<u>Issuer</u>	Card #	Brand	Balance
172.	17-985-44	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx7843	Visa	\$100
173.	17-985-45	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx3388	Visa	\$100
174.	17-985-45	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx8050	Visa	\$100
175.	17-985-45	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx2694	Visa	\$100
176.	17-985-45	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx0558	Visa	\$100
177.	17-985-45	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx4958	Visa	\$100
178.	17-985-45	Sunrise Banks, Nat'l Assoc'n	403446xxxxxx0389	Visa	\$100

TOTAL: \$17,000

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet.

the civil docket sheet. (SEE IN					
Place an "X" in the appropr	iate box:	y Division 🔀 Milwau	kee Division		
I. (a) PLAINTIFFS			DEFENDANTS		
UNITED STATES OF AMERICA			APPROXIMATELY \$16,400.00 IN UNITED STATES CURRENCY FROM SUNRISE BANKS, ET AL.		
(b) County of Residence	of First Listed Plaintiff _			,	Milwaukee
(E)	XCEPT IN U.S. PLAINTIFF CA	SES)	NOTE:	(IN U.S. PLAINTIFF CASES OF IN LAND CONDEMNATION CONTENT THE TRACT OF LAND INVOL	ASES, USE THE LOCATION OF
(c) Attorneys (Firm Name), Scott J. Campbell, AU, US Attorney's Office	530 Federal Building		Attorneys (If Known)		
517 E. Wisconsin Aver			. CITIZENSHIP OF P	RINCIPAL PARTIES	(Place an "X" in One Box for Plaintiff)
	Terrore (Flace an X	in one Box Only)	(For Diversity Cases Only)	RIIVEII ME I MRIIES	and One Box for Defendant)
■ 1 U.S. Government Plaintiff	☐ 3 Federal Question (U.S. Government)	Not a Party)		TF DEF 1 □ 1 Incorporated or Pri of Business In This	*
☐ 2 U.S. Government Defendant	☐ 4 Diversity (Indicate Citizensh	ip of Parties in Item III)	Citizen of Another State	2	*
			Citizen or Subject of a Foreign Country	3 🗖 3 Foreign Nation	a 6 a 6
IV. NATURE OF SUIT		nly) RTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
☐ 110 Insurance	PERSONAL INJURY	PERSONAL INJURY		☐ 422 Appeal 28 USC 158	☐ 375 False Claims Act
□ 110 Insurance □ 120 Marine □ 130 Miller Act □ 140 Negotiable Instrument □ 150 Recovery of Overpayment	PERSONAL INJURY □ 310 Airplane □ 315 Airplane Product	PERSONAL INJURY 365 Personal Injury - Product Liability 367 Health Care/ Pharmaceutical Personal Injury Product Liability 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY 370 Other Fraud 371 Truth in Lending 380 Other Personal Property Damage Product Liability PRISONER PETITIONS 510 Motions to Vacate Sentence Habeas Corpus: 530 General 533 Death Penalty 540 Mandamus & Other 550 Civil Rights 555 Prison Condition 560 Civil Detaince - Conditions of Confinement	□ 625 Drug Related Seizure of Property 21 USC 881	□ 422 Appeal 28 USC 158 □ 423 Withdrawal	□ 375 False Claims Act □ 400 State Reapportionment □ 410 Antitrust □ 430 Banks and Banking □ 450 Commerce □ 460 Deportation □ 470 Racketeer Influenced and Corrupt Organizations □ 480 Consumer Credit □ 490 Cable/Sat TV □ 850 Securities/Commodities/Exchange □ 890 Other Statutory Actions □ 891 Agricultural Acts □ 893 Environmental Matters □ 895 Freedom of Information Act □ 896 Arbitration □ 899 Administrative Procedure Act/Review or Appeal of Agency Decision □ 950 Constitutionality of State Statutes
☑ 1 Original ☐ 2 Ren	Cite the U.S. Civil Sta 18 USC §§ 981(Appellate Court atute under which you are fa)(1)(A) and (C)			
VI. CAUSE OF ACTION	Brief description of ca	ause:			
VII. REQUESTED IN COMPLAINT:	CHECK IF THIS UNDER F.R.C.P.	IS A CLASS ACTION . 23	DEMAND \$	CHECK YES only JURY DEMAND:	if demanded in complaint: ☐ Yes I No
VIII. RELATED CASE IF ANY	E(S) (See instructions):	JUDGE		DOCKET NUMBER	
DATE		SIGNATURE OF ATTOR	RNEY OF RECORD		
01/19/2018	19/2018 s/SCOTT J. CAMPBELL				
FOR OFFICE USE ONLY					

UNITED STATES DISTRICT COURT EASTERN DISTRICT OF WISCONSIN AT LAW AND IN ADMIRALTY

UNITED STATES OF AMERICA,

Plaintiff,

v. Case No.

APPROXIMATELY \$16,400.00 IN UNITED STATES CURRENCY FROM SUNRISE BANKS,

APPROXIMATELY \$400.00 IN UNITED STATES CURRENCY FROM AMERICAN EXPRESS, and

APPROXIMATELY \$200.00 IN UNITED STATES CURRENCY FROM U.S. BANK,

Defendants.

WARRANT FOR ARREST IN REM

To: THE UNITED STATES SECRET SERVICE Eastern District of Wisconsin

WHEREAS, a Verified Complaint for Civil Forfeiture *in rem* was filed on the 19th day of January, 2018, by the United States Attorney for the Eastern District of Wisconsin, which seeks the forfeiture of the above-named defendant properties pursuant to Title 18, United States Code, Sections 981(a)(1)(A) and (C), including cross-references to Title 18, United States Code, Sections 1956(c)(7) and 1961(1), and which prays that process issue to enforce the forfeiture and to give notice to all interested parties to appear before the court and show cause why the

forfeiture should not be decreed; and due proceedings being had, that the defendant properties be condemned and forfeited to the use of the United States of America.

YOU ARE THEREFORE HEREBY COMMANDED to attach and arrest the following defendant properties, which are presently in the custody of the United States Secret Service in Milwaukee, Wisconsin, in the Eastern District of Wisconsin, and to detain the same until further order of this Court:

- A. Approximately \$16,400.00 in United States currency from Sunrise Banks, which constitutes all funds stored on 172 access device cards identified under numbers 7 through 178 on Exhibit A attached to the Verified Complaint for Civil Forfeiture *in rem*, and which funds were seized on or about January 18, 2018,
- B. Approximately \$400.00 in United States currency from American Express, which constitutes all funds stored on access four device cards identified under numbers 3 through 6 on Exhibit A attached to the Verified Complaint for Civil Forfeiture *in rem*, and which funds were seized on or about January 18, 2018, and
- C. Approximately \$200.00 in United States currency from U.S. Bank, which constitutes all funds stored on two access device cards identified under numbers 1 and 2 on Exhibit A attached to the Verified Complaint for Civil Forfeiture *in rem*, and which funds were seized on or about December 11, 2017.

Dated this	day of Janu	ary, 2018, at Milwaukee, Wisconsin.
		STEPHEN C. DRIES Clerk of Court
	By:	
		Deputy Clerk

Return

This warrant was received and executed with the arrest of the above-named defendants.

Date warrant received:
Date warrant executed:
Name and title of arresting officer:
Signature of arresting officer:
Date: